

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EARNEST HAMLIN,)	
)	
Plaintiff,)	
)	
vs.)	Court No. 1:20-cv-01141
)	
CITY OF CHICAGO,)	Honorable Valderrama
CPD P.O. DALCASON #5392)	
in his individual capacity,)	Magistrate Judge Jeffrey Cole
CPD P.O. COLLAZO #11298)	
in his individual and capacity,)	JURY TRIAL DEMANDED
WAVELAND BOWL, LLC)	
)	
Defendants.)	

JOINT DISCOVERY SCHEDULE

Pursuant to this Court's Order, the parties respectfully submit their Joint Discovery Schedule:

1. Discovery Schedule

- A. The parties have exchanged Mandatory Initial Disclosures.
- B. The parties have begun exchanging written discovery, the parties propose any additional written discovery be issued by April 30, 2021.
- C. The parties anticipate the following depositions:
 - a. City Defendants and Defendant Waveland Bowl anticipate deposing Plaintiff, his damages witnesses, several occurrence witness (approximately 5-7 individuals known to Defendants at this time), Plaintiff's treating physicians, and potentially deposing the Assistant State's Attorneys who participated in the underlying criminal case.
- D. The parties therefore propose a fact discovery close date of September 1, 2021.

Respectfully Submitted,

<p><u>/s/ Michael P. Schmiede</u> Michael P. Schmiede Law Offices of Michael P. Schmiede, PC 33 East 1st Street, 2nd Floor Hinsdale, IL 60521 312-697-1836 312-626-2401 mikeschmiede@gmail.com Attorney for Plaintiff Earnest Hamlin</p>	<p><u>/s/ Andréa L. Campbell</u> Iris Chavira Cheryl Friedman Andrea Campbell City of Chicago Department of Law 2 N. LaSalle Street, Suite 420 Chicago, IL 60602 312-744-8362 iris.chavira@cityofchicago.org Cheryl.Friedman1@cityofchicago.org Andrea.Campbell@cityofchicago.org Attorney for City of Chicago</p>
<p><u>/s/ Ryan M. Neri</u> Craig M. Derrig Ryan M. Neri Wood Smith Henning & Berman, LLP 222 South Riverside Plaza Suite 640 Chicago, Illinois 60606 (312) 766-4450 (p) (312) 766-4451 (f) cderrig@wshblaw.com rneri@wshblaw.com Attorneys for Waveland Bowl, Inc. (incorrectly sued as Waveland Bowl, LLC)</p>	<p><u>/s/ Jessica L. Griff</u> Victoria Rose Benson Jessica Griff Dortricia Penn City of Chicago Department of Law 2 N. LaSalle Street, Suite 420 Chicago, IL 60602 312-744-2826 victoria.benson@cityofchicago.org Jessica.Griff@cityofchicago.org Dortricia.Penn@cityofchicago.org Attorneys for Defendants John Dalcason and Michael Collazo</p>